

To Whom It May Concern

From: Robert W. Commerford

RE: USE OF ANKUS AND CHAINS FOR ELEPHANTS

I wish to address the issue of the use of the ankus and chains to assure the safe handling of elephants. Please be advised of the following:

- My family and I have owned elephants for nearly a half a century, since 1960. We raised our elephants from babies when I purchased them at the age of three. My sons, daughters-in-law, and grandchildren grew up with our elephants, assist with their care, and consider each elephant as a member of the family.
- There are hundreds of millions of domestic and farm animals in this country. It is customary to use leashes when walking our dogs and harness and bits to guide horses. Just as naturally and humanely, the ankus and chains when transporting and feeding our 10,000 pound elephants. USDA rules mandate that elephants have to be under control at all times. This is especially relevant when transporting and feeding our elephants.
- The elephants in our care are integral to the success of our family owned business. We generate significant income for the local businesses in the area as well as the state of Connecticut. We purchase tens of thousands of dollars in hay, feed and related products for our animals. We have thirty tax- paying residents working for us. Our business is responsible for 30 State of Connecticut registrations. We pay significant property taxes in the village of Goshen, CT.
- Our elephants have been inspected literally thousands of times by the USDA, SPCA, state and local officials in Connecticut and dozens of other states. R.W. Commerford & Sons has never been written up for improper use of an ankus.
- Our Farm, and specifically our elephant barn, is open for inspection 24 hours a day, seven days a week with an appointment. Our elephant barn is warm and comfortable with radiant heated floors. The elephants are chained only when the veterinarian makes his regular examinations and at feeding times. Elephants are prone to steal other elephant's food if measures are not taken to prevent this.
- Without the use of the ankus and chains we cannot handle, transport, or feed our elephants safely. Should restrictive legislation be passed that would make our use of the ankus and chains in Connecticut impossible, this potentially force the relocation of our farm and operation to another state. With the challenges facing small businesses in our area as well as the State Of Connecticut, we feel this would certainly have detrimental economic impact.

PINE PLAINS VETERINARY ASSOCIATES, P.C.

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PINE PLAINS, NEW YORK 12567

PHONE 518/398-9494 FAX 518/398-9696

DR. D.W. HART

DR. HELM-VAN KLEECK

March 6, 2009

To Whom It May Concern:

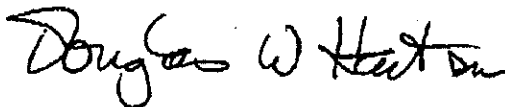
I am writing to express my support for the Commerford family of Goshen, CT.

I am a veterinarian engaged in a general practice in Pine Plains, NY for the past 42 years. I also have served as a member of the board of directors of the Dutchess County Fair for the past 16 years. I am currently president of the Dutchess County Agricultural Society, which is the group, which owns the Dutchess County Fair Grounds and has operated the fair for the past 164 years.

It is in my capacity as a fair director that I became acquainted with the Commerford family. I have had many opportunities to observe the care with which the animals in their charge are treated. For the past two years, I have been the regular veterinarian for the Commerford Farm. I treat any sick animals, administer routine vaccinations, and do regular inspections of all animals, including the elephants.

The level of care I have observed has always been exemplary. All animals in the Commerford's care are well fed and housing is above average. I have never observed any mistreatment of any animals. The elephants in particular are well cared for with a heated barn and a large exercise area enclosed with huge natural stones instead of a wire fence. This area provides the elephants with safe area to move freely. I have been able to easily examine the elephants including mouth exams and regular testing for tuberculosis.

In my opinion, the Commerford family should be held up as an example of people who love their animals and care for them as if they were family members. They are giving thousands of people, many of them very young, the opportunity to interact on a personal basis with animals in a caring, compassionate setting.



Douglas W. Hart, DVM

March 2, 2008

The Honorable Edward Meyer
Connecticut General Assembly
Joint Committee on the Environment
Room 3200, Legislative Office Building
Hartford, CT 06106

The Honorable Richard Roy
Connecticut General Assembly
Joint Committee on the Environment
Room 3200, Legislative Office Building
Hartford, CT 06106

RE: HB 6555 – Concerning the Treatment of Elephants

Dear Representatives Meyer and Roy:

On behalf of the Outdoor Amusement Business Association (OABA), we are writing in opposition to HB 6555. We believe the legislation demonstrates a misunderstanding of elephant management and is redundant in light of existing rules and regulations governing the care and treatment of exhibition animals, both at the federal and local levels.

According to the Elephant Husbandry Resource Guide (“EHRG”) published by the International Elephant Foundation (IEF) in conjunction with the Elephant Managers Association (EMA) and the Association of Zoos and Aquariums (AZA), there are two generally accepted forms of elephant management – “free contact” which involves handlers sharing the same space as the animal; and “protected contact” in which the animal is managed through protective barriers with no direct contact. Most elephant facilities (e.g., zoos and animal parks) fall somewhere along a continuum between absolute free contact and absolute protected contact, using a mixture of management practices in response to the needs of the animals in their care, the experience level of their staff and the physical constraints of the facility.

Elephants in traveling shows are managed under the free contact system, which requires continuous supervision of the animal when outside its primary enclosure. In virtually every elephant management system employed, a guide or “ankus” is an essential and required tool. Used properly, the ankus provides important behavioral cues to the animal to guide the animal through desired behaviors. Additionally, chains are employed not only because of their strength but because they are the most hygienic and easily cleaned form of restraint. Tethered elephants are always provided ample room to turn, lie down and make all normal postural adjustments, while ensuring that their food source remains clear of their waste.

Performing elephants are not only well cared for, they are in exceptional physical condition due to a regular routine of exercise during and rides and performances. To allege otherwise demonstrates a limited understanding of elephants, their abilities and the care they are provided.

The proposed legislation, which prohibits or greatly restricts the use of an ankus, chains and similar tools fails to consider their proper – and appropriate -- role in elephant management and assumes only the most extreme and irresponsible misuse. It also fails to take into consideration existing laws and regulations against myriad other abusive behavior, such as local animal cruelty laws and the role of the USDA under the Animal Welfare Act or “AWA” (7 U.S.C. §2131 et

seq).

As licensed exhibitors, zoos and circuses are subject to regular inspections and regulations promulgated under the AWA. The code of federal regulations at 9 C.F.R. §2.131(a)(1) specifically states that animals be handled "as carefully as possible in a way that does not cause trauma, overheating, excessive cooling, behavioral stress, **physical harm, or unnecessary discomfort**" (emphasis added).

OABA members include carnivals, circuses (performers and performing exotic/domestic animal acts), food and game concessionaires and others associated with the mobile, outdoor amusement business that operate at state and county fairs, festivals and other civic, religious or philanthropic activities such as Shrine Temple fundraising events. In addition to our agricultural exhibitors, OABA also represents approximately 60 circuses, animal acts and petting zoo members operating within the U.S., providing safe, affordable, "G" rated, family entertainment and education.

Similar legislation was rejected by the Connecticut Assembly last session and should be again this year. On behalf of the over 10,000 family owned business that comprise OABA, I urge you and your colleagues to reject any efforts to enact this bill into law. Should you have any questions or seek additional information, please do not hesitate to contact me.

Sincerely,

Robert W. Johnson

Robert W. Johnson
President